

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

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ETHICON WAVE 12 CASES LISTED IN  
EXHIBIT A OF DEFENSE NOTICE OF  
ADOPTION

JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE OF  
NEERAJ KOHLI, M.D., M.B.A. FOR WAVE 12**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert response filed against Neeraj Kohli, M.D., M.B.A. for Ethicon Wave 3, Dkt. 2944. Plaintiffs respectfully request that the Court deny Defendants' motion, for the reasons expressed in the Wave 3 response briefing.

Dated: November 12, 2019

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 12, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett  
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